



Los Angeles County Department of Regional Planning

Planning for the Challenges Ahead



Richard J. Bruckner
Director

October 28, 2015

Mr. Steve Rusch
Vice President
Freeport-McMoRan Oil & Gas
5640 S. Fairfax Avenue
Los Angeles, California 90056

Dear Mr. Rusch:

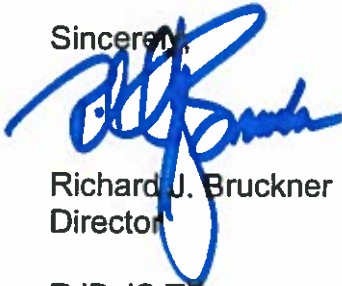
As you are aware, the Baldwin Hills Community Standards District (CSD) was adopted into Title 22 of the Los Angeles County Code on October 28, 2008, to provide a means of implementing regulations, safeguards, and controls for activities related to drilling for and production of oil and gas within the Baldwin Hills area of the County of Los Angeles. The purpose of the CSD is to help ensure that oil field operations are conducted in harmony with adjacent land uses, minimize the potential adverse impacts on neighbors, and to enhance the appearance of the site with landscaping and other property maintenance requirements. Since then, the County, the oil field operator and community representatives have been working together to ensure that the standards of the CSD are implemented to protect the comfort, health, safety, and general welfare of people living, working, and recreating in the surrounding areas.

Pursuant to Section 22.44.142.G.7 of the CSD, the County conducted a comprehensive review of the requirements of the CSD to determine if the provisions achieve this objective. The Periodic Review Final Report (Report) (September 2015) concluded that the provisions of the CSD have been effective, and that no modification to the current language of the CSD is recommended. The Report, however, identifies ten recommendations to strengthen implementation procedures of the CSD. I reviewed the Report and agree with its conclusions.

Mr. Steve Rusch
October 28, 2015
Page 2

Accordingly, the Department of Regional Planning (DRP) requests that Freeport-McMoRan Oil & Gas immediately begin implementing the recommendations related to CSD Sections E.1.a; E.10; E.15.a; E.19; E.20; E.26.c.x; E.28.b; and J.2.a as summarized on page 12 of the Report (attached). I am instructing DRP staff to begin work on the Report's recommendations related to CSD Sections F.3, F.4, and J.1.a. Please contact Timothy Stapleton at (213) 974-6453, or tstapleton@planning.lacounty.gov with any questions. We look forward to continuing our work together.

Sincerely,



Richard J. Bruckner
Director

RJB:JS:TS:ar

Attachment

102615_LUR_L_SRUSCH

1.7 SUMMARY OF RECOMMENDATIONS

This Periodic Review has resulted in a number of recommendations to enhance the implementation of the provisions of the CSD. These recommendations do not require a modification or change to the language of the CSD ordinance; rather, the recommendations are improvements in the method of implementation or compliance effort of the subject provision as summarized in the table below.

CSD Provision	Summary of Recommendation
E.1.a	In response to requests made by the public, it is recommended that the annual Community Alert Notification (CAN) tests include interested residents.
E.10	Recommendation that FM O&G schedule installation of the remaining landscaping phases to achieve the landscaping required by this provision in a timely manner.
E.15.a	Recommendation that the Operator continue the use of metal and or plastic bins and tanks consistent with current practice as the elimination of the use of below ground sumps is considered to be a significant environmental benefit.
E.19	Based on comments by the RWQCB regarding potential additional monitoring locations, it is recommended that the Operator coordinate with the RWQCB and install additional groundwater monitoring wells if deemed necessary.
E.20	Due to un-authorized access through damaged fencing, it is recommended the ECC and the Operator increase monitoring of the condition of the perimeter fencing and conduct any necessary repairs as soon as possible.
E.26.c.x	In consideration of the usefulness and substantial costs associated with the preparation of the topographic vertical profiles, it is recommended considering removing the subject figures/maps from the Annual Drilling Plan until the information is deemed useful for inclusion in future plans.
E.28.b	It is recommended that the Operator facilitate better coordination when scheduling reworking and the other types of rigs at the oil field to avoid concentrating too many rigs in one area.
F.3	A comprehensive SIMQAP audit has not been conducted to date. It is recommended that a SIMQAP audit be conducted over the next year in coordination with the EQAP audit and that appropriate interested regulatory agencies be noticed of the audit for participation as applicable.
F.4	Due to the fact that unannounced drills have not taken place in the past, it is recommended that efforts be made to ensure that unannounced drills take place at the oil field as allowed for by the provision of the CSD. The Department of Regional Planning will coordinate with the Fire Department to ensure that unannounced drills occur in the future.
J.1.a	In response to requests by the public to update CAP membership, allow new members to fill vacant panel seats and replace absentee members, the DRP Director will review CAP membership and determine how to proceed under the existing provision of the CSD.
J.2.a	In response to public input on the 2013 Community Meeting, it is recommended that agendas for future Community Meetings be specific to oil field operations and issues and that measures be implemented to ensure questions from the public are addressed appropriately.